

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

In Re: SADIE B. PEREZ, : CHAPTER 13
Debtor : BANKRUPTCY NO. 18-10107

**ORDER SUR DEBTOR'S SECOND AMENDED OBJECTIONS TO PROOFS OF CLAIM
FILED BY THE CITY OF PHILADELPHIA ("CITY") AND THE WATER REVENUE
BUREAU OF THE CITY ("WRB")**

AND NOW, this _____ day of November, 2018, it is hereby ORDERED

as follows:

1. The Amended Objections are SUSTAINED.
- 2.. The Proofs of Claim filed by CITY and WRB (Nos 3 and 4) are REDUCED to

\$_____ for real estate taxes and liens and \$_____ for water.

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

In Re: SADIE B. PEREZ, : CHAPTER 13
Debtor : BANKRUPTCY NO. 18-10107

**DEBTOR'S SECOND AMENDED OBJECTIONS TO PROOFS OF CLAIM ("POC's")
FILED BY THE CITY AND SCHOOL DISTRICT OF PHILADELPHIA ("the City") (No.
4) AND THE CITY WATER REVENUE BUREAU("WRB") (No. 3).**

Commented [David1]: ENDED

Per an Order of this court of October 9, 2018, the Debtor was directed to file

Amended Objections to the City's claims and proceeds to do so as follows:

Regarding Claim No. 3:

Most of the Claim appears to be is for water service at 5243 Westford Rd. from 2006 through 2018. However, the Debtor had no water service at this property for a considerable portion of this period, and she never received any water bills approaching the amount of this claim. The Debtor therefore believes that the amount claimed is erroneous and excessive.:

2. Regarding Claim No. 4:

1. The Claim fails to describe the services allegedly performed by the City or its agents which constitutes the charges imposed.

2. The loan secured by a mortgage against the Debtor's property on Walnut Street was made in 2005. All of the liens at issue predate that loan. The Debtor therefore believes that the liens at issue should have been and therefore were satisfied prior to the making of the loan.

3. Regarding all Claims:

The Debtor has requested on numerous occasions that the City allow her

abatement of charges and/ or a payment plan to pay off whatever are found to be rightful charges because she is a low-come, disabled person. She continues to request that such relief be granted to her in order that she can propose a feasible bankruptcy plan.

WHEREFORE, the Debtor continues to requests that this court will enter the Proposed Order accompanying these Amended Objections.

/s/DAVID A. SCHOLL
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